

BROWN'S BATTERY BREAKING SITE  
ADMINISTRATIVE RECORD FILE \*  
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

- 1) Report: Site Analysis, Brown's Battery Breaking Site,  
Berks County, Pennsylvania, prepared by The Bionetics  
Corporation, 2/84. P. 100001-100016.

\* Administrative Record File available 8/2/89, updated  
8/17/90, updated 10/12/90.

Note: Company and organizational affiliation is identified in  
the index only when it appears in the file.

## II. REMEDIAL ENFORCEMENT PLANNING

- 1) Memorandum of Purchase Option, between Mr. Robert T. Brown and Mrs. Barbara A. Brown, and Price Battery Corporation, prepared by Berks Title Insurance Company, 10/1/62. P. 200001-200001.
- 2) Letter to Mr. Rolland E. Shade, General Battery Corporation, from Mr. John Watts Barrett, Barrett and Monaghan, re: Request for a release from a land purchase option, 11/11/77. P. 200002-200005. An executed release from the purchase option and a notary's statement are attached.
- 3) Letter to Mr. John Watts Barrett, Barret [sic] and Monaghan, from Mr. R.E. Shade, General Battery Corporation, re: Transmittal of the executed release from the purchase option, 11/22/77. P. 200006-200006.
- 4) Letter to Mr. Rolland E. Shade, General Battery Corporation, from Mr. John Watts Barrett, Barrett and Monaghan, re: Release from the purchase option, 12/20/77. P. 200007-200007.
- 5) Summary of October 25, 1983 Meeting between U.S. EPA and General Battery Corporation, prepared by Mr. Richard L. Zambito, U.S. EPA, 10/25/83. P. 200008-200008.
- 6) Letter to Mr. Thomas Massey, U.S. EPA, from Mr. J.A. Bitler, General Battery Corporation, re: Transmittal of names of medical experts with experience in treatment of high lead exposure in children, 10/27/83. P. 200009-200010. A list of the names and addresses of the physicians is attached.
- 7) Memorandum to Mr. J. Bitler, General Battery Corporation, from Mr. J. Leed, General Battery Corporation, re: Recyclability of lead-containing rubber battery cases and soil, 10/28/83. P. 200011-200011.
- 8) Memorandum to Record from Mr. J. Leed, General Battery Corporation, re: Transmittal of a copy of an article from the October 28, 1983 issue of Environment Reporter regarding U.S. EPA procedures at hazardous waste sites, 11/7/83. P. 200012-200012.

- 9) Letter to Mr. John Bitler, General Battery Corporation, from Mr. Robert J. Mitkus, U.S. EPA, re: EPA activities at the Brown's Battery Breaking Site in lieu of voluntary action by potentially responsible parties, 11/9/83. P. 200013-200014.
- 10) Letter to Mr. John Bitler, General Battery Corporation, from Mr. Robert J. Mitkus, U.S. EPA, re: EPA activities at the Brown's Battery Breaking Site in lieu of voluntary action by potentially responsible parties, with a list of concurrences, 11/9/83. P. 200015-200017. A memorandum regarding the recyclability of lead-containing rubber battery cases and soil is attached.
- 11) Letter to Mr. William F. Price from Mr. J.A. Bitler, General Battery Corporation, re: Transmittal of a copy of EPA notification regarding cleanup action at the Brown's Battery Breaking site, 11/14/83. P. 200018-200018.
- 12) Letter to Mr. and Mrs. Terry L. Shaner Sr. from Mr. J.A. Bitler, General Battery Corporation, re: Transmittal of a copy of EPA notification regarding clean-up action at the Brown's Battery Breaking Site, 11/15/83. P. 200019-200019.
- 13) Memorandum to Mr. C. Petzold from Mr. J.A. Bitler re: Request for information on options for consuming the rubber cases from the site landfill, 12/13/83. P. 200020-200020.
- 14) Memorandum to Mr. J. Bitler, General Battery Corporation, from Mr. D. Ferrante, General Battery Corporation, re: Relocation of families from the Brown Battery Breaking Site, 12/15/83. P. 200021-200021.
- 15) Memorandum to Mr. John Bitler, General Battery Corporation, from Mr. John Hardy, General Battery Corporation, re: Research of the whereabouts of Barbara B. Brown, and other relatives of Robert T. Brown, Sr., 12/15/83. P. 200022-200024. A copy of a page from a telephone directory is attached.
- 16) Letter to Mrs. Barbara B. Brown from Mr. John A. Bitler, General Battery Corporation, re: Transmittal of a copy of EPA notification regarding clean-up action

at the Brown's Battery Breaking Site, 12/16/83.  
P. 200025-200025.

- 17) Letter to Mr. John A. Bitler, General Battery Corporation, from Mr. Paul Essigi, re: Whereabouts of Barbara Brown, 12/20/83. P. 200026-200026.
- 18) Letter to Mr. John Bitler, General Battery Corporation, from Mr. Robert J. Mitkus, U.S. EPA, re: 104(e) information request, 1/10/84. P. 200027-200028.
- 19) Memorandum to Mr. J.A. Bitler, General Battery Corporation, from Mr. C.G. Petzold, General Battery Corporation, re: Transmittal of requested documents concerning Brown Battery Company, 1/19/84. P. 200029-200029.
- 20) Summary of January 27, 1984 Meeting Between U.S. EPA and General Battery Corporation, prepared by Mr. Richard L. Zambito, U.S. EPA, 1/27/84. P. 200030-200030.
- 21) Memorandum to Mr. C. Petzold, General Battery Corporation, from Mr. J.A. Bitler, General Battery Corporation, re: Request for information regarding Brown Battery Breaking Company, 1/30/84. P. 200031-200031.
- 22) Summary of February 9, 1984 Meeting between U.S. EPA and General Battery Corporation (GBC), prepared by Mr. Richard Zambito, U.S. EPA, 2/9/84. P. 200032-200032.
- 23) Letter to Mr. Kermit Rader, U.S. EPA, from Mr. Denis V. Brennan, Morgan, Lewis & Bockius, re: Transmittal of a list of materials requested, 2/17/84. P. 200033-200033.
- 24) Letter to Mr. Kermit Rader, U.S. EPA, from Mr. Denis V. Brennan, Morgan, Lewis & Bockius, re: Address of William F. Price, principal and chief executive officer of Price Battery Corporation, 3/1/84. P. 200034-200034.
- 25) Order In The Matter Of General Battery Corporation, 3/2/84. P. 200035-200049. A location map and a capping waste design diagram are attached.

- 26) Letter to Mr. Kermit Rader, U.S. EPA, from Mr. J.A. Bitler, General Battery Corporation, re: Response to the EPA's 104(e) information request, 3/8/84. P. 200050-200051.
- 27) Letter to Mr. Richard Zambito, U.S. EPA, from Mr. Gary R. Galida, Pennsylvania Department of Environmental Resources, re: Legal classification of cleanup activities under CERCLA, 3/21/84. P. 200052-200052.
- 28) Letter to Mr. John Bitler, General Battery Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Request for reimbursement for response actions performed by EPA under CERCLA, 9/19/84. P. 200053-200055. A receipt for certified mail is attached.
- 29) Letter to Mr. John Bitler, General Battery Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Potential liability for costs of additional work to be performed at the Brown's Battery Breaking Site, 4/25/86. P. 200056-200059. A receipt for certified mail is attached.
- 30) Letter to Ms. Carol E. Stokes, U.S. EPA, from Mr. John A. Bitler, General Battery Corporation, re: Clarification of conditions stated in earlier correspondence, 5/8/86. P. 200060-200061.
- 31) Letter to Ms. Carol E. Stokes, U.S. EPA, from Mr. John A. Bitler, General Battery Corporation, re: Request for additional information prior to General Battery Corporation's participation in the proposed Remedial Investigation/Feasibility Study (RI/FS), 5/14/86. P. 200062-200063.
- 32) Letter to Ms. Carol Stokes, U.S. EPA, from Ms. Kristine A. Crosswhite, Miles & Stockbridge, re: Confirmation of extension for the Julian C. Cohen Salvage Corporation to indicate its intent to participate in the Remedial Investigation/ Feasibility Study, 5/14/86. P. 200064-200064.
- 33) Letter to Mr. John A. Bitler, General Battery Corporation, from Ms. Carol Stokes, U.S. EPA, re: General Battery Corporation's participation in the Remedial Investigation/Feasibility Study and

development of a Statement of Work (SOW), 5/23/86.  
P. 200065-200067. A receipt for certified mail is  
attached.

- 34) Letter to Ms. Carol Stokes, U.S. EPA, from Mr. Denis V. Brennan, Morgan, Lewis & Bockius, re: Confirmation of an extention [sic] granted to General Battery Corporation relative to the performance of a Remedial Investigation/ Feasibility Study, 6/26/86. P. 200068-200068.
- 35) Memorandum to Ms. Carol Stokes, U.S. EPA, from Ms. Libby Rhoads, U.S. EPA, re: Wetland areas which may be impacted by the Brown's Battery Breaking Site, 6/30/86. P. 200069-200069.
- 36) Letter to Ms. Carol Stokes, U.S. EPA, from Mr. John A. Bitler, General Battery Corporation, re: General Battery Corporation's intention to participate in the Remedial Investigation/Feasibility Study, 7/25/86. P. 200070-200070.
- 37) Routing and Transmittal Slip to Mr. Kermit Rader, from Carol [sic], re: Brown's Battery Draft Order, 8/20/86. P. 200071-200073. A letter regarding the necessity of a Consent Order and a Statement of Work and a receipt for certified mail are attached.
- 38) Letter to Ms. Carol Stokes-Cawley, U.S. EPA, from Mr. Frank A. Labor III, Morgan, Lewis & Bockius, re: Amendment of timetable regarding General Battery Corporation's participation in the Remedial Investigation/Feasibility Study, 8/27/86. P. 200074-200075.
- 39) Report of Conversation to Mr. Jeff Lead [sic], General Battery Corporation, from Ms. Carol Stokes-Cawley, re: Well specifications, 9/22/86. P. 200076-200076.
- 40) Memorandum to Browns Battery Site File, from Ms. Carol Stokes-Cawley, U.S. EPA, re: Details concerning the Statement of Work for the Remedial Investigation/Feasibility Study, 11/26/86. P. 200077-200078.
- 41) Letter to Ms. Carol Stokes, U.S. EPA, from Mr. Denis V. Brennan, Morgan, Lewis & Bockius, re: Transmittal of a Scope of Work, 12/1/86. P. 200079-200079.

- 42) Letter to Ms. Carol Stokes-Cawley, U.S. EPA, from Mr. John A. Bitler, General Battery Corporation, re: Transmittal of the revised Statement of Work, 12/24/86. P. 200080-200080.
- 43) Letter to Mr. John A. Bitler, General Battery Corporation, from Mr. Jack Kelly, U.S. EPA, re: Proposed revisions to the Statement of Work, 1/27/87. P. 200081-200081.
- 44) Letter of Transmittal to Mr. John Bitler, General Battery Corporation, from Mr. W.G. Christopher, Engineering-Science, re: Transmittal of the revised Statement of Work, 3/6/87. P. 200082-200082.
- 45) Letter to Mr. Jack Kelly, U.S. EPA, from Mr. John A. Bitler, General Battery Corporation, re: Transmittal of a revised Project Schedule, 3/12/87. P. 200083-200086. A graphical Project Schedule, a marked-up copy of a graphical Project Schedule and a written summary of the Project Schedule are attached.
- 46) Administrative Order On Consent In The Matter Of Brown's Battery Breaking Company Site, 6/30/87. P. 200087-200140.
- 47) Letter to Mr. Jack Kelley [sic], U.S. EPA, from Mr. Jeffrey A. Leed, General Battery Corporation, re: Transmittal of the Work Plan for the Remedial Investigation/Feasibility Study, 8/11/87. P. 200141-200141.
- 48) Letter of Transmittal to Mr. J. Kelly, U.S. EPA, from Mr. J.P. McAuliffe, Engineering-Science, re: Transmittal of the Brown's Battery Breaking Site Work Plan and Quality Assurance Project Plan, 8/21/87. P. 200142-200142.
- 49) Letter to Mr. Jack Kelley [sic], U.S. EPA, from Mr. Jeffrey A. Leed, General Battery Corporation, re: Submittal of the Health and Safety Plan for approval, 10/1/87. P. 200143-200143.
- 50) Letter to Mr. Jeffrey Leed, Exide Corporation, from Mr. Jack Kelly, U.S. EPA, re: Resolution of Remedial Investigation/Feasibility Study Work Plan issues, 3/25/88. P. 200144-200145.
- 51) Letter to Mr. Jack Kelly, U.S. EPA, from Mr. Frank A.

Labor III, Morgan, Lewis & Bockius, re: General Battery/Exide Corporation's response to EPA modifications of the proposed Work Plan, 5/6/88. P. 200146-200148.

- 52) Letter to Mr. Frank Labor, Morgan, Lewis & Bockius, from Mr. Jack Kelly, U.S. EPA, re: Proposed modifications to the Work Plan, 7/1/88. P. 200149-200157. A list of additional work to be required as Phase II of the Remedial Investigation and a list of necessary revisions to the proposed Work Plan are attached.
- 53) Letter to Mr. Jack Kelly, U.S. EPA, from Mr. Frank A. Labor III, Morgan, Lewis & Bockius, re: Acknowledgement of receipt of correspondence regarding General Battery Corporation, 7/8/88. P. 200158-200158.
- 54) Letter to Mr. Jack Kelly, U.S. EPA, from Mr. Frank A. Labor III, Morgan, Lewis & Bockius, re: General Battery Corporation's refusal to perform the Remedial Investigation/Feasibility Study, 8/4/88. P. 200159-200160.
- 55) Letter to Mr. Frank Labor III, Morgan, Lewis & Bockius, from Mr. James M. Seif, U.S. EPA, re: EPA commencement of Remedial Investigation/Feasibility Study activities at the Brown's Battery Site, 8/25/88. P. 200161-200163. Two certified mail receipts are attached.
- 56) Memorandum to Mr. J.W. Horton, General Battery Corporation, from Mr. J.A. Bitler, General Battery Corporation, re: Transmittal of photographs of the Brown Battery Breaking facility, 10/27. P. 200164-200164.
- 57) Letter to Mr. Robert T. Brown, Brown's Battery Breaking Company, from Mr. S. Dershwil, Price Battery Corporation, re: Renewal of a contract for breaking batteries, 12/10. P. 200165-200165.
- 58) List of parties sent Remedial Investigation/Feasibility Study (RI/FS) notice letters, (undated). P. 200166-200168. A list of parties from which responses were received is attached.



### III. REMEDIAL RESPONSE PLANNING

- 1) Report: Feasibility Study for Brown's Battery Breaking Site, prepared by IT Envirosience, 12/16/83. P. 300001-300064.
- 2) Report: Extent of Contamination Survey for the Brown's Battery Breakage Site, prepared by U.S. EPA, 12/83. P. 300065-300128.
- 3) Report: Brown's Battery Breaking Site, Remedial Action Master Plan and Remedial Investigation/ Feasibility Study Work Plan, Final Draft, prepared by Ecology and Environment, Inc., 1/86. P. 300129-300230.
- 4) Letter to Ms. Linda Boornazian, U.S. EPA, from Mr. Harry P. Butler, CDM Federal Programs Corporation, re: Transmittal of Health and Safety Plan for the site reconnaissance visit at the Brown's Battery Breaking Site, 3/3/87. P. 300231-300255. The Health and Safety Plan is attached.
- 5) Letter to Mr. Frank A. Labor III, Morgan, Lewis and Bockius, from Mr. Kermit Rader, U.S. EPA, re: Transmittal of the revised draft of the Consent Order with comments, 3/19/87. P. 300256-300276. The order is attached.
- 6) Letter to Mr. Kermit Rader, U.S. EPA, from Mr. Frank A. Labor III, Morgan, Lewis & Bockius, re: Transmittal of the Brown's Breaking Site Administrative Order On Consent, 6/15/87. P. 300277-300277.
- 7) Letter to Mr. Jeffrey Leed, General Battery Corporation, from Mr. Jack Kelly, U.S. EPA, re: Transmittal of EPA's comments on the RI/FS Work Plan, 11/10/87. P. 300278-300279.
- 8) Memorandum to Mr. Jack Kelly, U.S. EPA, from Mr. H. Ronald Preston, U.S. EPA, re: Review and recommendations of the Remedial Investigation Work Plan, 12/2/87. P. 300280-300379. The following are attached:
  - a) a draft of the review memorandum;
  - b) a memorandum regarding deficiencies in the Project Plan;
  - c) a Quality Assurance Project Plan Review;
  - d) a letter regarding the analysis of metals in

- soil samples;
  - e) Table I - inorganic target analyte list;
  - f) Table II - contract laboratory program analytical information;
  - g) a letter regarding the transmittal of a summary report of a discussion of Remedial Investigation/Feasibility Study issues;
  - h) a letter regarding the transmittal of a revised summary of a meeting;
  - i) a report entitled "Revised Summary of January 7, 1988 Meeting to Discuss EPA Comments on the RI/FS Work Plan for Brown's Battery Site";
  - j) a work plan review of the Remedial Investigation/Feasibility Study;
  - k) a letter regarding EPA's response to the Remedial Investigation/Feasibility Study Work Plan;
  - j) a letter regarding General Battery Corporation's unwillingness to perform the Remedial Investigation/Feasibility Study;
  - l) a letter regarding EPA's intention to perform the Remedial Investigation/ Feasibility Study;
  - m) a handwritten memorandum regarding communications with Terry Shaner.
- 9) Boring Logs # 1, 3, and 2 for Brown's Battery Breaking Site, prepared by the New England Pollution Control, Co., Inc, 3/22/89. P. 300380-300386. A topographic and geologic survey for wells # 1, 2, and 3 and a site plan of the respective wells are attached.
- 10) Report: Quality Assurance Project Plan, prepared by Black & Veatch Inc., 5/15/89. P. 300387-300790.
- 11) Technical Support Documents, prepared by the U.S. EPA, undated. P. 300791-300894. The following are attached:
- a) a calculation sheet for lead concentration in air at site;
  - b) a calculation sheet for lead concentration in leafy vegetables from site gardens;
  - c) a report entitled "Feasibility Study for Brown's Battery Breaking Site";
  - d) a memorandum regarding lead results on samples at the Terry Shaner site;

- e) a letter regarding potential financial responsibility for EPA activities at the Brown's Battery Breaking site;
  - f) a Notice of Violation to Terry and Susan Shaner;
  - g) a letter regarding Price Battery Corporation's response to an information request;
  - h) a letter regarding the extension of a deadline and confirmation of the guardianship of William F. Price;
  - i) a Letter of Guardianship;
  - j) a letter regarding procedures between the Price Battery Corporation and Brown's Battery Breaking Company;
  - k) a Deed between Barbara A. Brown, and Terry L. Shaner and Susan A. Shaner;
  - l) a Deed between Terry L. Shaner and Susan A. Shaner, and Terry L. Shaner Jr.;
  - m) a letter regarding the blood lead levels of four children;
  - n) a Fund Authorization Request, Immediate Removal Request for the Brown's Battery Breaking site.
12. Report: Appendix C - Sampling Analysis Plan, Brown's Battery Breaking Site, prepared for the U.S. EPA, 5/15/89. P. 300895-300954.
  13. Report: Draft Addendum to Field Sampling Plan, prepared by B & V Waste Science and Technology Corp., 9/12/89. P. 300955-300972.
  14. Report: Draft Revision No.1, Remedial Investigation/ Feasibility Study , (undated). P. 300973-301505.
  15. Memorandum to Mr. Chris Corbett, U.S. EPA, from Mr. Richard Brunker, U.S. EPA, re: Calculated hazards from exposed soil, 7/31/90. P. 301506-301507.
  16. Superfund Program Proposed Plan, Brown's Battery Site, 8/90. P. 301508-301519.
  17. Letter to Mr. Christopher Corbett, U.S. EPA, from Mr. Joseph Gormley, B & V Waste Science and Technology Corp., re: Transmittal of a calculation for lead concentration at the Brown's Battery Site, 8/1/90.

P. 301520-301525.

18. Report: Your Rights and Benefits as a Displaced Program, prepared by the U.S. Department of Transportation, (undated). P. 301526-301551.
19. General Guidance: Federal Register, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs, (undated). P. 301552-301591.
20. Letter to Mr. Christopher Corbett, U.S. EPA, from Mr. Joseph Gormley, B & V Waste Science and Technology, Corp., re: Submittal of cost calculations for permanent relocation alternatives, 8/15/90. P. 301592-301594.
21. Memorandum to Mr. Chris Corbett, U.S. EPA, from Mr. Richard L. Brunker, U.S. EPA, re: Toxicity Assessment of the Brown's Battery Record of Decision, 9/5/90. P. 301595-301596.
22. Declaration for the Record of Decision, Brown's Battery Breaking Site, 9/28/90. P. 301597-301684.

IV. REMOVAL

- 1) Report: Federal On-Scene Coordinator's Report, Brown's Battery Breaking Site, Tilden Township, Berks County, Pennsylvania, CERCLA Immediate Removal Action, Volume I, 10/20/83-7/11/84. P. 400001-400217.
- 2) Report: Federal On-Scene Coordinator's Report, Brown's Battery Breaking Site, Tilden Township, Berks County, Pennsylvania, CERCLA Immediate Removal Action, Volume II, 10/20/83-7/11/84. P. 400218-400609.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

- 1) Sampling Location Map, 11/83. P. 500001-500001.
- 2) Waste Thickness Contour Map, 11/83. P. 500002-500002.
- 3) Contour Map with Areas of Contamination, 1/16/84.  
P. 500003-500003.
- 4) Letter to Honorable William Ruckelshaus, U.S. EPA, from Mr. John Heinz, U.S. Senate, re: Safe Drinking Water Act, 2/29/84. P. 500004-500007. A letter regarding complaints about the cleanup of the Brown's Battery site and a congressional correspondence control slip are attached.
- 5) Letter to Honorable John Heinz, U.S. Senate, from Mr. Thomas P. Eichler, U.S. EPA, re: Procedures of the EPA Superfund Emergency Removal Program and how they pertain to the Brown's Battery site, 3/7/84.  
P. 500008-500010.
- 6) Letter to Honorable Gus Yatron, House of Representatives, from Mr. Thomas P. Eichler, U.S. EPA, re: Procedures of the EPA Superfund Emergency Removal Program and how they pertain to Brown's Battery Site, 3/7/84. P. 500011-500027. The following are attached:
  - a) a copy of the aforementioned letter;
  - b) a letter regarding complaints about the cleanup of the Brown's Battery site;
  - c) two congressional correspondence control slips;
  - d) a letter regarding transmittal of correspondence;
  - e) five photocopied newspaper articles.
- 7) Land Survey Map, 5/84. P. 500028-500028.
- 8) Letter to the Congressional Relations Director, U.S. EPA, from Mr. John Heinz, U.S. Senate, re: Transmittal of correspondence complaining about the EPA's actions, 10/17/84. P. 500029-500033. A handwritten letter regarding the battery recycling business is attached.
- 9) A Congressional Correspondence Control Slip from Honorable John Heinz, U.S. Senator, 11/7/84.  
P. 500034-500038. Two copies of a letter regarding the status of the Brown's Battery site cleanup and the

EPA view of its impact are attached.

- 10) Aerial Photographs of the Brown's Battery Breaking Site, 7/24/85. P. 500039-500041. A site layout map is attached.
- 11) Report: Community Relations Plan, prepared by NUS Corporation, 9/26/86. P. 500042-500058.
- 12) Two Photography Volumes of Brown's Battery Breaking Site, (undated). P. 500059-500325. The following are included:
  - a) 1,019 color photographs;
  - b) 39 pages of 35mm negative film strips;
  - c) 1 slide.